Central Coast Regional Water Quality Control Board

NOTICE OF ORDER CHANGE AND SECOND OPPORTUNITY TO COMMENT

Regarding

DRAFT WASTE DISCHARGE AND WATER RECLAMATION REQUIREMENTS ORDER R3-2025-0008 FOR THE PURE WATER MONTEREY ADVANCED WATER PURIFICATION FACILITY AND GROUNDWATER REPLENISHMENT REUSE PROJECT FOR ISSUANCE TO MONTEREY ONE WATER MONTEREY COUNTY

NOTICE IS HEREBY GIVEN that the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is accepting comments on updated language in Attachment D, Water Reclamation Requirements, in draft Order R3-2025-0008, *Waste Discharge and Water Reclamation Requirements, Pure Water Monterey Groundwater Replenishment Reuse Project* (Order).

The draft Order incorporates revised conditions from State Water Resources Control Board (State Water Board) *Division of Drinking Water's* (DDW) *Conditional Acceptance of the Pure Water Monterey Groundwater Replenishment Project Engineering Report (2790002-710)* (Conditional Acceptance Letter) dated August 28, 2025, which consists of modifications to individual injection well limits and administrative changes that do not alter substance or intent of the draft Order. A copy of the Conditional Acceptance Letter is found in Attachment 1. This public notice is to provide a second comment period for the changes.

This public noticing follows an initial 30-day opportunity to comment on the draft Order, which ended on August 22, 2025 (first comment period). Comments received as part of the first comment period are under review and any resulting changes to the draft Order will be available in the final meeting agenda and staff report at least 10 days before the Central Coast Water Board meeting (see below for more details).

The draft Order can be accessed at the following link:

http://www.waterboards.ca.gov/centralcoast/board_decisions/tentative_orders

BACKGROUND

The draft Order made available for public comment during the first public comment period included provisions in accordance with DDW's July 11, 2025 Conditional Acceptance Letter. These provisions, which were based on information presented in the Pure Water Monterey final Title 22 Engineering Report and appendices, included

volumetric injection limits on each of the four deep injection wells used for injection of advanced treated water into the Seaside Basin as part of the Pure Water Monterey Groundwater Replenishment Project. On August 21, 2025, Monterey One Water issued a letter to DDW with information supporting revisions to two of those limits that more clearly explained the operational scenarios presented in the Title 22 Engineering Report and appendices. On August 28, 2025, DDW updated Conditional Acceptance Letter accepting the proposed changes to volumetric injection limits for two deep injection wells based on operational injection capacity. Additional background information and justification for the changes are found in Attachment 1.

DRAFT ORDER CHANGES, ATTACHMENT D

The Central Coast Water Board incorporated the revised conditions from DDW's August 28, 2025, Conditional Acceptance Letter into the draft Order, Attachment D, Water Reclamation Requirements. This public comment period is to solicit comments solely on the revisions to Attachment D. These modifications include updates to two individual injection well limits and administrative changes that do not alter substance or intent of the draft Order. The changes to injection limits for the two deep injection wells are explicitly included below, with previous limits stricken, and new limits underlined:

> **4.2.1.** Based on the information provided in the Engineering Report, the following rolling volumetric injection limits are required for DIW-1, DIW-2, DIW-3, and DIW-4.

Table 1. Injection Limits at Specific Wells

Well	Rolling 4-month average injection limit (acre-ft/month)
DIW-1	29
DIW-2	~~46~~ 53
DIW-3	~~126~~ 170
DIW-4	118

PUBLIC HEARING

The Central Coast Water Board will hold a public hearing on **October 9-10, 2025**, to consider the issuance of the proposed Order at the following location:

Santa Barbara County Offices
Santa Barbara County Board of Supervisors Hearing Room
105 East Anapamu Street, 4th Floor, Santa Barbara

Interested persons are invited to attend the hearing and may make oral comments relevant to the proposed action. The Chair of the Central Coast Water Board will impose time limits on oral comments. The final meeting agenda and staff report will be available at least 10 days before the Board meeting, at: https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2025/2025_agendas.html

The agenda will provide the specific date this item will be considered during the Board meeting, indicate the anticipated order of all agenda items, and may include staff revisions to the proposed Order.

SUBMISSION OF WRITTEN COMMENTS

Persons interested in providing written comments **on the changes described in this notice** are encouraged to submit comments by electronic mail. **Comments submitted on topics outside the scope of the changes described herein will not be considered**. Comments must be received by 5:00 PM on **Friday, September 12, 2025**. Comments received after the deadline will not be accepted and will not be included in the administrative record absent a ruling by the Central Coast Water Board Chair. Any person requesting to submit late comments must demonstrate good cause for the late submission and the Chair must find that accepting the late submission will not prejudice the Central Coast Water Board or the Discharger. All interested persons and the Discharger may speak at the public meeting and are expected to orally summarize their written submittals. Oral comments will be limited in time by the Chair.

Written comments are to be sent to the Waste Discharge Requirements Unit by email (must be no more than 15 megabytes) RB3-WDR@Waterboards.ca.gov or by mail to:

Waste Discharge Requirements Unit
Central Coast Water Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Please also indicate in the subject line **"Comment Letter – Pure Water Monterey"**

Please direct any questions about this notice to the Waste Discharge Requirements Unit at RB3-WDR@Waterboards.ca.gov.

FUTURE NOTICES

The Central Coast Water Board will hold the public meeting at the time and place noted above. Any change in the date, time, and place of the Board meeting will be noticed through the e-mail distribution list and posted on the Central Coast Water Board's website. Any person desiring to receive future notices concerning changes to the notice of public meeting and consideration of adoption must sign up for the e-mail distribution list. To sign up for the e-mail distribution email list, access the Central Coast Water Board E-mail Subscription form, select the box for 'Board Meeting Agenda,' and provide the required information. The subscription form is located at:

https://www.waterboards.ca.gov/resources/email_subscriptions/reg3_subscribe.html
Please bring the above information to the attention of anyone you know who would be interested in this matter.

LANGUAGE SERVICES

The draft Order is available in English. To request translation of written documents, interpretation services in another language or sign language services, please use one of the following options:

- Submit a Language Services Request online.
- Call the Office of Public Participation at (916) 445-5615
- Email the Office of Public Participation at opp-languageservices@waterboards.ca.gov

Attachment 1. DDW August 28, 2025 Conditional Approval Letter

La Junta Regional para el Control de la Calidad del Agua (Regional Water Quality Control Board) está notificándoles a todas aquellas personas interesadas sobre un orden preliminar para la planta de tratamiento de aguas residuales y el proyecto de reposición de aquas subterráneas de "Monterey One Water." Si desea obtener información en español, póngase en contacto con RB3-WDR@Waterboards.ca.gov.

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Attachment 1: State Water Resources Control Board (State Water Board) *Division of Drinking Water's* (DDW) *Conditional Acceptance of the Pure Water Monterey Groundwater Replenishment Project Engineering Report (2790002-710)* (Conditional Acceptance Letter) dated August 28, 2025,

State Water Resources Control Board
Division of Drinking Water

August 28, 2025

(Sent via e-mail: Ryan.Lodge@waterboards.ca.gov)
Ryan Lodge
Executive Officer
Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

DIVISION OF DRINKING WATER'S CONDITIONAL ACCEPTANCE OF THE PURE WATER MONTEREY GROUNDWATER REPLENISHMENT PROJECT ENGINEERING REPORT (2790002-710)

Dear Mr. Lodge,

This letter transmits the California State Water Resources Control Board, Division of Drinking Water (DDW) conditional acceptance of the final Monterey One Water (M1W) Pure Water Monterey Groundwater Replenishment Project (Project) Engineering Report (Engineering Report) dated May 2025.

The Engineering Report is prepared as a Five-Year Engineering Report update to the April 2019 Pure Water Monterey Engineering Report that was accepted by DDW on August 20, 2019. The Engineering Report is submitted to provide information regarding operational changes and regulatory compliance activities undertaken since the Project commenced operations in 2019, and to provide information on the Project expansion.

The expanded Project will increase the capacity of the Advanced Water Purification Facility (AWPF) from 5 million gallons per day (MGD) to 7.6 MGD and increase injection volumes to the Seaside groundwater basin from 3,700 acre-foot per year (AFY) to 5,950 AFY. Construction activities related to the Project expansion are scheduled to be completed in summer 2025.

The Engineering Report states that the goal of the expanded Project is to produce an average of 5,750 AFY of purified recycled water for injection into the Seaside Basin to enable California American Water Company (Cal-Am) to reduce its diversions from the Carmel River system and its use of native Seaside Basin groundwater and to provide water for growth in the Cal-Am service area. The expanded Project also includes additional injection volume to store water in the Seaside Basin of an additional 200 AFY in wet and normal years, bringing the maximum total injection into the Seaside Basin of 5,950 AFY.

The Project meets the definition of a Groundwater Replenishment Reuse Project (GRRP) pursuant to California Code of Regulations, title 22, section 60301.390 using

subsurface application (Cal. Code Regs., tit. 22, § 60301.840) and therefore is subject to the requirements of the California Code of Regulations, title 22, sections 60320.200 through 60320.230. Per California Code of Regulations, title 22, section 60323. The Project is required to receive DDW approval for an Engineering Report that describes its design and means for compliance with Title 22 regulations and any other requirements specified by DDW.

A public hearing, following a minimum of 30-days of public comment period, on the Engineering Report was held on April 10, 2025. M1W provided a summary of public comments and responses to DDW staff on May 7, 2025. The public notification on the public hearing, the public hearing presentation slides, and comments and responses to the public comments are included as Appendices P, Q, and R, respectively, to the Engineering Report.

A conditional acceptance letter for this Project was sent to the Regional Board on June 3, 2025. A second conditional acceptance letter was sent on July 11, 2025, to incorporate corrections to condition A.2. The July 11, 2025, conditional acceptance letter was incorporated as Appendix D in draft Order R3-2025-0008, which was issued for public comment on July 23, 2025.

After discussions with DDW and the Regional Board, M1W sent a response to the July 11, 2025, conditional acceptance letter to DDW on August 21, 2025, requesting modifications to condition D.2. This request was justified in the letter by more clearly explaining the operational scenarios presented in the May 2025 Title 22 Engineering Report and appendices. The requested change to the July 11, 2025, conditional acceptance letter was also discussed in M1W's comment letter to the Regional Board regarding draft Order R3-2025-0008 sent on August 22, 2025.

This conditional acceptance letter addresses comment raised by M1W in the August 21 and 22, 2025 correspondence and supersedes all previous DDW conditional acceptance letters for the Project. DDW recommends that the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) incorporate the conditions provided in this letter as a part of M1W's waste discharge requirements for the Project.

A. General Requirements

1. M1W must comply with all components of California Code of Regulations, title 22, division 4, chapter 3, article 5.2, Indirect Potable Reuse: Groundwater Replenishment using Subsurface Application.

2. Delivery of flows from the AWPF using DIW-1, DIW-2, DIW-3, DIW-4, VZW-1, and VZW-2 into the Seaside groundwater water basin must not exceed 3,700 AFY. Total delivery of flows from the AWPF, including the expanded Project wells DIW-5 and DIW-6, into the Seaside groundwater basin must not exceed 5,950 AFY.

3. Per California Code of Regulations, Title 22, section 60320.200(g), M1W must

demonstrate that all treatment processes are installed and can be operated to achieve their intended function described in the Engineering Report and Operation Optimization and Plan (OOP). As described in the Engineering Report section 3.2, M1W must provide a copy of the expanded AWPF commissioning plan that includes verification of operation integration, SCADA system integration, commissioning process, performance tests, and checks for regulatory compliance. Prior to start of delivery of product water from the expanded AWPF to the injection wells, the M1W must demonstrate to DDW that the alarms and associated responses, including automatic diversion, retreatment, and shutdown, are functional and in conformance with the Operation Optimization Plan (OOP) during an on-site inspection.

4. M1W must provide a map of the Project site to DDW, Central Coast Water Board, County of Monterey Department of Environmental Health, Monterey Peninsula Water Management District, and any other local well-permitting authorities, containing the required information provided in California Code of Regulations, title 22, sections 60320.200(e)(1) through (4).

    a. M1W must provide DDW and the Central Coast Water Board with a copy of the adopted resolution or local ordinance adopted by local well-permitting authorities for the following:

        i. Restriction of new well construction in the boundary representing a zone of controlled private and municipal drinking water well construction, the greatest of horizonal and vertical distances reflecting the retention times required pursuant to California Code of Regulations, title 22, sections 60320.208 and 60320.224;

        ii. Requirement for potential future private and municipal drinking or non-drinking water wells located in a secondary boundary representing a zone of potential controlled well construction, which includes but are not limited to further study and potential mitigating activities.

    b. M1W must notify DDW and Central Coast Regional Water Board in writing of any proposals for new well constructions within zones described in (a)(i) and (a)(ii) above, within 30 calendar days of approval of a well construction permit by the respective well-permitting authorities, along with if any, a description of conditions (such as further study or mitigating activities) placed on the approval .

    c. A revised map and associated resolution or ordinance must be prepared and provided to DDW, Central Coast Water Board, County of Monterey Department of Environmental Health, Monterey Peninsula Water Management District, and any other local well-permitting authorities, when conditions change such that the previous map no longer accurately reflects the project operations.

5. M1W must notify DDW and the Central Coast Regional Water Board and submit documentation deemed necessary by or as requested by DDW for any changes

to any portion of the Project operations described in the Engineering Report. This includes but are not limited to increased AWPF product water delivery to the MCWD recycled water distribution system or injection wells; changes to monitoring wells or injection wells; changes to AWPF treatment processes; introduction of new sources to the AWPF; and any changes to Cal-Am drinking water well operation that may impact the Project's underground retention time.

6. The Project has a recycled water contribution of 1.0. No diluent water has been proposed or approved for the Project.

B. Wastewater Source Control

1. Recycled municipal wastewater used for the Project must meet the requirements in California Code of Regulations, title 22, sections 60320.206 – Wastewater Source Control.

2. Any updates to the source control plans, local limits, and pretreatment program addressing water sources for the Project must be provided to the DDW and the Central Coast Water Board.

3. M1W must provide a written confirmation to DDW and Central Coast Water Board that all of the required actions and program improvements provided in the 2022 Pretreatment Compliance Audits have been completed. If incomplete or in progress, M1W must provide a schedule for anticipated completion.

C. AWPF Requirements

1. Per California Code of Regulations, title 22, section 60320.201(a)(2), during the first 20 weeks of operation of the expanded Project, the reverse osmosis (RO) permeate must be monitored at least weekly for total organic carbon (TOC) for the new RO unit. TOC concentrations must be no greater than 0.25 mg/l in at least 95% of the samples.

2. The UV/AOP must be operated as designed and described in the Engineering Report and the Operations and Optimization Plan to meet California Code of Regulations, title 22, section 60320.201 requirements, providing a minimum of 0.5-log reduction of 1,4-dioxane.

3. Within 60 days of completing the first 12-month full-scale operation and operational monitoring of the advanced treatment process for the expanded Project, M1W must submit a report to the Division and the Regional Water Board pursuant to California Code of Regulations, title 22, sections 60320.201(f) and (g).

4. Per California Code of Regulations, title 22, section 60320.201(h), M1W must perform calculations to document proper on-going performance of the reverse osmosis and advanced oxidation processes and report in the quarterly reports. State the percentage of results of the quarter's monitoring, conducted pursuant to the California Code of Regulations, title 22, sections 60320.201(b) and (e), that did not meet the surrogate or operational parameter limits. State in the quarterly report if the limits were exceeded by greater than 10% of time for each quarter.

5. M1W proposes to follow a tiered monitoring approach for the reverse osmosis (RO) system. Pathogen reduction through the RO system may be demonstrated via the tiered monitoring approach. M1W must report calculated surrogate reduction values from all tiers and indicate which tier is used for reporting pathogen log reduction. M1W must include an updated example form and sample calculation for the surrogate reduction in the Operations and Optimization Plan for DDW acceptance.

    a. Tier 1: Daily samples of the combined RO feed stream and effluent stream of each RO train must be analyzed at least every 24 hours for strontium. The RO log reduction value (LRV) credit will be calculated daily by the reduction in strontium concentration demonstrated by the lowest LRV from the RO trains (i.e. using the highest RO effluent strontium concentration). DDW Environmental Laboratory Accreditation Program (ELAP) has updated FOT 103 Toxic Chemical Elements in Drinking Water to include Elemental Strontium. Strontium analysis must be performed by laboratories with current ELAP accreditation. The results of strontium analysis must be available within 24 hours. If strontium data are unavailable, the RO LRV credit must be determined by the second tier.

    b. Tier 2: Continuous TOC monitoring (at least once every 15-minutes) of the combined RO feed stream and the combined RO effluent stream. The RO LRV credit will be calculated based on the average daily reduction in TOC. If first tier (strontium) and second tier (TOC) data are unavailable, the RO LRV credit must be determined by the third tier.

    c. Tier 3: Continuous electrical conductivity (EC) monitoring (at least once every 15-minutes) of the combined RO feed stream and effluent stream of each RO train. The RO LRV credit must be calculated based on the minimum daily EC reduction, if first tier (strontium) and second tier (TOC) data are unavailable.

6. Pursuant to California Code of Regulations, title 22, section 60320.201(b), M1W must perform an on-going performance monitoring that indicates when the integrity of the process has been compromised. M1W must update the RO monitoring program elements in the Pure Water Monterey Operation Optimization Plan and include at least the following elements:

    a. Determination of baseline integrity test values for intact membranes during commissioning of the Advanced Water Purification Facility (AWPF).

    b. Determination of lower and upper control limits for each surrogate to be used for integrity testing. Perform surrogate mass balance calculations for the RO treatment system to provide the basis for lower and upper control limit values. Provide a response plan for exceedances of lower and upper control limits.

    c. M1W includes vessel EC probing (i.e. vessel integrity) as an example of corrective actions in response to treatment failures. Include a description on the vessel sampling plan and breach response proposal.

7. Consistent with the California Code of Regulations, title 22, section 60301.320(b), the combined membrane filter effluent turbidity must not exceed the following limits: 0.2 NTU more than 5 percent (%) of the time within a 24-hour period; and
0.5 NTU at any time. Exceedance of turbidity limits must trigger automatic reliability feature (i.e. failed membrane unit to be placed offline automatically) and corresponding corrective action(s) as described in the Operations Optimization Plan. Discrete turbidity readings must be recorded at a set interval to determine compliance with the turbidity requirements and limits. Averaging cannot be utilized for the determination of compliance with turbidity limits. M1W must propose the frequency of the discrete turbidity readings and its justification for the selection in the updated Operations and Optimization Plan.

8. Consistent with California Code of Regulations, title 22, section 60301.230(b), the median concentration of total coliform bacteria measured in the AWPF effluent must not exceed an MPN of 2.2 per 100 milliliters utilizing the bacteriological results of the last seven days for the which analyses have been completed and the number of total coliform bacteria shall not exceed an MPN of 23 per 100 milliliters in more than one sample in any 30 day period. No sample shall exceed an MPN of 240 total coliform bacteria per 100 milliliters.

9. M1W will be utilizing ultrafiltration for its membrane filtration system installed upstream of the reverse osmosis process. Membrane integrity testing using a pressure decay test (PDT), must be performed on each unit of the membrane train(s) on a minimum frequency of once every 24 hours of operation and when turbidity limits exceed as stated in C.7. The membrane filtration process must be equipped with apparatus to perform daily direct integrity test (DIT). The PDT rate must not exceed the manufacturer specified decay rate approved by DDW and must be reflected in the OOP and SCADA setpoints. The following apply to the DIT:

    a. The pathogen log reduction values (LRV) for Giardia cysts and Cryptosporidium oocysts must be calculated and the values recorded after the completion of each MIT. The Giardia cysts and Cryptosporidium oocysts LRV is 4 and virus LRV is zero as described in the Engineering Report. The maximum LRV credit given for Giardia cysts and Cryptosporidium oocysts is subject to DDW's conditional acceptance for the specific membrane used and must be described in the OOP.

    b. The MIT must have a resolution that is responsive to an integrity breach on the order of 3 microns (µm) or less.

    c. Daily calculations of the LRV must be based on a pressure decay rate (PDR) value with an ending pressure that provides a resolution of 3 µm or less.

    d. The MIT must have a sensitivity to verify an LRV equal to or greater than 4.0.

    e. If a membrane unit fails MIT, the membrane unit must be removed from

service, repaired, and have acceptable MIT results prior to being placed back into service.

10. NDMA and Sucralose are performance surrogates for RO and must be analyzed quarterly both prior to the RO and after RO prior to the AOP.

D. Response Retention Time

1. Pursuant to California Code of Regulations, title 22, section 60320.224(c), a tracer study utilizing an added or intrinsic tracer must be implemented under hydraulic conditions representative of normal GRRP operation to confirm the Engineering Report's estimated retention time from DIW-5 and DIW-6. M1W must submit a tracer study protocol for DDW and Central Coast Water Board approval prior to conducting a tracer study. The tracer study must be initiated prior to the end of the third month of injection of AWPF product water into DIW-5 and DIW-6. Results of the tracer study must be approved by DDW and the Central Coast Water Board.

2. The Project must be operated in a manner that is protective of the water systems' drinking water supply well sources. The current and proposed injection from all DIWs must be controlled to ensure underground travel time to the nearest drinking water wells is more than or equal to 4.0 months at all times.

    a. Based on the information provided in the Engineering Report, the following rolling volumetric injection limits are required for DIW-1, DIW-2, DIW-3, and DIW-4.

Well	Rolling 4-month average injection limit (acre-ft/month)
DIW-1	29
DIW-2	53
DIW-3	170
DIW-4	118

    b. DDW and the Central Coast Water Board may approve an alternative injection limit should permanent changes occur to the drinking water well operations (e.g. the drinking water well is decommissioned or destroyed).

3. M1W submitted the Notification and Response Plan (NRP) dated February 28, 2025, including the supporting "Potable Water Wheeling Agreement" between Cal-Am and Marina Coast Water District (MCWD). M1W is preparing an addendum to the NRP providing additional information on activation and operation of intertie between Cal-Am and MCWD systems for submittal to DDW. The addendum must be approved by DDW prior to start of delivery of product water from the expanded AWPF to the injection wells.

    a. M1W must perform notifications and response actions described in its latest DDW-approved NRP, including necessary coordination with Cal-Am and MCWD to provide an alternate source of drinking water supply to all users of a producing drinking water, that as a result of the Project's

operation as determined by DDW is impacted as described in California Code of Regulations, title 22, section 60320.200(b).

b. The NRP is effective once it is signed by all signatories and is approved by DDW.

c. The NRP must be effective and in place for the entire duration of Project operation.

d. M1W must notify DDW and the Central Coast Water Board of any modifications of the NRP and obtain subsequent DDW approval as required by California Code of Regulations, title 22, section 60320.200(b).

E. Pathogenic Microorganism Control

1. M1W must operate the Project such that the municipal recycled water used for groundwater recharge and replenishment achieves at least 12-log enteric virus reduction, 10-log Giardia cyst reduction, and 10-log Cryptosporidium oocyst reduction pursuant with CCR, title 22, section 60320.208.

2. In a monthly report provided to DDW and the Central Coast Water Board, M1W must report “Yes” or “No” for each day as to whether the total required pathogenic microorganism log reductions (12-logs virus, 10-logs Giardia cyst, and 10-logs Cryptosporidium oocyst) have been achieved based on the overall treatment train LRV. The overall treatment train LRV for Cryptosporidium oocyst, Giardia cyst and virus is the sum of LRV for each treatment process for each pathogen. An overall treatment train LRV must be provided daily unless the AWPF is offline for a 24-hour period.

3. Per California Code of Regulations, title 22, section 60320.208(h), if the required Cryptosporidium oocyst, Giardia cyst and virus reduction are not met based on the required on-going monitoring detailed in the DDW-approved OOP, within 24 hours of being aware, M1W must investigate the cause and initiate corrective actions.

F. Reporting

1. M1W operates a multi-barrier treatment facility to comply with the requirements of Article 5.2. Monitoring for the purpose of chemical and pathogen log reduction calculation and demonstration must be reported electronically to DDW and Central Coast Water Board monthly. Monthly reports are due by the 15th day of the following month in a reporting format approved by DDW and Central Coast Water Board. Deviations from the approved monthly report format must be resubmitted in writing by M1W for review and approval by DDW and Central Coast Water Board. Updated monthly report format must be documented as an update to the Operations and Optimization Plan.

2. In accordance with California Code of Regulations, title 22, section 60320.218, the AWPF effluent must be sampled for TOC at least weekly prior to injection. M1W must report the weekly TOC results, the 20-week running average of all TOC results, and the average of the last four results in a quarterly report. The

analytical results of the TOC monitoring performed pursuant California Code of Regulations, title 22, section 60320.218 shall not exceed 0.5 mg/l.

3. M1W must submit an annual report to DDW and RWQCB, no later than six months after the end of each calendar year, meeting the requirements of California Code of Regulations, title 22, section 60320.228 subsection (a). M1W must update the Engineering Report meeting the requirements of California Code of Regulations, title 22, section 60320.228 subsection (b) and submit it to the DDW and RWQCB at least every five years.

4. M1W must perform monitoring, reporting, and actions in the event of discovery or exceedances of chemical or contaminant limits in accordance with California Code of Regulations, title 22, sections 60320.201 subsection (i), 60320.210, 60320.212, 60320.220, and 60320.226. Pursuant to California Code of Regulations, title 22, section 60320.220 subsections (a)(1) and (a)(2), M1W must perform quarterly monitoring for the Priority Toxic Pollutants (chemicals listed in 40 CFR section 131.38) and DDW specified chemicals in the recycled municipal wastewater and the groundwater (from the downgradient monitoring wells):

    a. Chemicals detected in RO permeate[1]:

        i. Quinoline, 2,3,5,6-tetrachloroterephthalate (DCPA), and chloropicrin. Monitoring in the recycled municipal wastewater must be conducted prior to RO, after RO prior to the advanced oxidation process (AOP), and after AOP prior to injection to recharge facilities.

        ii. Albuterol, erythromycin, carbadox, fluoxetine, caffeine, iohexol, and triclosan. Monitoring in the recycled municipal wastewater must be conducted prior to injection to recharge facilities.

    b. Pesticides of local interest: chloropyrifos and chlorothalonil. Monitoring in the recycled municipal wastewater must be conducted prior to injection to recharge facilities.

5. Each quarter, M1W must sample and analyze the recycled municipal wastewater for chemicals having drinking water notification levels (NLs) in accordance with California Code of Regulations, title 22, section 60320.220 subsection (b). As of May 2025, the latest version of the NLs list is dated November 1, 2022, and is available on the State Water Board webpage: https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/NotificationLevels.html

6. Annually, M1W must submit to DDW and the Central Coast Water Board a summary of coordination activities with MCWD on the operation and maintenance of the Product Water Pipeline and the Purified Water Reservoir (Blackhorse Reservoir) necessary for protection of the product water for injection.

[1] Pure Water Monterey Groundwater Replenishment Project: Advanced Water Treatment Facility Piloting Report, Draft Report – January 2016

At a minimum, M1W must be kept informed of the status of testing and maintenance of backflow preventers on the Product Water Pipeline, occurrence of backflow incidents (if any), and maintenance activities of the Purified Water Reservoir.

7. In addition to monitoring data submittal requirements to the Central Coast Water Board, M1W must use DDW-provided Primary Station Codes (PS Codes) to electronically submit monitoring results from the advanced pure water facility (AWPF) monitoring points and groundwater monitoring wells. Data produced and reports submitted for analysis required by Title 22, Division 4, Article 5.2 must be generated by a laboratory accredited by ELAP. The laboratory must hold a valid certificate of accreditation for the analytical test methods validated for intended use and approved by DDW. The laboratories performing the analyses must submit the results electronically to DDW's database by the tenth day of the following month in which analysis was completed. Bacteriological data cannot at this time be transmitted electronically to DDW. A summary of bacteriological results must be e-mailed to dwpdist05@waterboards.ca.gov and ddwrecycledwater@waterboards.ca.gov once a month, by the 10th of each month.

8. If a result of the monitoring performed pursuant to California Code of Regulations, title 22, section 60320.201(i) or section 60320.212 exceeds a contaminant's primary MCL or action level (for lead and copper), M1W shall collect another sample within 72 hours of notification of the result and then have it analyzed for the contaminant as confirmation. If the average of the initial and confirmation sample exceeds the MCL or action level, or the confirmation sample is not collected and analyzed pursuant to section 60320.212, M1W must notify DDW and the Central Coast Water Board and perform subsequent monitoring in accordance with section 60320.212(d).

9. If the annual average of the results of the monitoring performed pursuant to California Code of Regulations, title 22, section 6030.201(i) or section 60320.212 exceeds a contaminant's secondary MCL, M1W must initiate quarterly monitoring of the advanced treated recycled water for the contaminant and perform subsequent actions in accordance with section 60320.212(e).

10. If a result of the monitoring performed pursuant to California Code of Regulations, title 22, section 60320.201(i) or section 60320.220(b) exceeds a contaminant's notification level (NLs), M1W shall collect another sample within 72 hours of notification of the result and then have it analyzed for the contaminant as confirmation. If the average of the initial and confirmation sample exceeds the NLs, or the confirmation sample is not collected and analyzed pursuant to section 60320.220(b), M1W must notify DDW and the Central Coast Water Board and perform subsequent monitoring in accordance with section 60320.220(b).

11. M1W must report the total injection volume into the Seaside groundwater basin on a monthly basis as following:

    a. Injection volume to each Project injection well in acre-foot per month.

b. A four (4) month rolling average of injection volume to each Project injection well in acre-foot per month.

c. Total injection volume from all Project injection wells to date.

12. M1W must provide a volumetric summary on the makeup of source waters (which may include, but are not limited to municipal wastewater, agricultural washwater, bypass industrial wastewater discharged from Salinas industrial wastewater system, Blanco Drain, and Reclamation Ditch) entering the Regional Treatment Plant in the annual report to DDW and Central Coast Water Board required per California Code of Regulations, title 22, section 60320.228(a). At a minimum, the summary must include discussion on the following items:

    a. The priority of source water usage for the period reported and the basis for the priority.

    b. A summary of monthly volume for each source water type.

    c. An evaluation of which demand scenario best fit the volumes observed during reporting period (Drought, Normal/Wet Full Reserve, Normal/Wet Building Reserve).

G. Operations and Optimization Plan

1. M1W must operate the Project in accordance with the OOP, reviewed and accepted by DDW prior to start of operations, pursuant to Title 22 CCR § 60320.222. M1W must submit a draft OOP to the DDW and RWQCB prior to delivery of product water from the expanded AWPF to the injection wells. The draft OOP may be amended and finalized after the completion of full-scale startup and commissioning testing. The final OOP must be submitted to DDW no later than 90 days after the completion of startup and commission testing and incorporate any changes as directed by DDW.

2. The OOP must always be representative of the current operations, maintenance, staffing, analytical methods, monitoring, and reporting of the Project in accordance with California Code of Regulations, title 22, section 60320.222.

3. In accordance with California Code of Regulations, title 22, section 60320.222(b), during the first year of the delivery of product water from the expanded AWPF to the injection wells, and at all times thereafter, all treatment processes must be operated in a manner providing optimal reduction of all chemical and contaminants. Within six months of optimizing treatment processes, and anytime thereafter operations are optimized that results in a change in operation, M1W must update the OOP to include such changes in operational procedures and submit the OOP for review and acceptance by DDW.

4. At a minimum, the OOP must identify and describe the operations, maintenance, analytical methods, monitoring necessary for the Project to meet the requirements of California Code of Regulations, title 22, division 4, chapter 3, article 5.2, and the reporting of monitoring results to the DDW and RWQCB. The OOP must include, at a minimum, the following elements:

a. Operations plan (including any calculations needed for the validation of unit process's pathogen log reduction credits per California Code of Regulations, title 22, section 60320.208(c), chemical dosage calculations, injection well back-flushing, start-up, and shutdown procedures). Preventative maintenance program (including prevention of cross connections, prevention of bypass treatment, equipment repair and replacement, UV lamp fouling, replacement program for membranes, instrumentation maintenance, and calibration).

b. Water quality monitoring program (including analytical methods, associated instrumentation, and PS-codes for monitoring locations).

c. Contingency plans (including responses to process upsets, power interruptions, off-spec water, water quality exceedances, and contact information for key personnel and agencies), and emergency response plan.

d. Records (including records related to preventative maintenance program, and contingency plan, sample templates for maintenance logs and monthly report, lessons learned to optimize treatment) and reporting (including procedures for reporting monitoring results, reports, process upsets, power interruptions, off-spec water, and water quality exceedances).

e. Process controls quick reference guide for operators in (1) the main treatment control center and (2) in the OOP that include, at a minimum, the following elements of reliability features:

    i. The alarm setpoints that trigger responses other than automatic diversion, retreatment, or shutdown (non-critical; critical control limits as defined during normal operations).

    ii. The alarm setpoints that trigger automatic reliability features: diversion, retreatment, or shutdown (critical alarms).

    iii. For each alarm, include the associated response and the associated instrumentation include the following: instrument tag, description, type (i.e., low, low-low, etc.), setpoint/trigger value, effect, time delay, and if the setpoint/trigger value is hardcoded.

    iv. The required frequency of calibration for any critical instrumentation, along with instrumentation tag and description, that has a setpoint measurement associated with a critical alarm.

f. The alarm setpoints, specifically for critical alarms the security access for changing the critical alarm set points. A standard operating procedure shall be referred to for the critical alarm set points maintenance and changes when required. This may include requirement of a programmer and/or SCADA software integrator to make the critical alarm set point change, higher level management staff (e.g., Operations manager, etc.)

with elevated SCADA login access or privileges to make critical alarm set point change, etc. Actions taken or changes that have been made to the AWPF to optimize the treatment process and/or the AWPF since the January 2021 version of the OOP.

5. M1W must update the OOP to incorporate any future revisions to chemical monitoring lists (e.g., MCLs, NLs) when communicated by DDW.

H. Laboratory Analyses

1. Per California Code of Regulations, title 22, section 60320.204 all laboratory analyses for contaminants having a primary or secondary maximum contaminant level (MCL) must be conducted using a drinking water method approved by DDW for the contaminant and by a laboratory accredited by the State Board Environmental Laboratory Accreditation Program (ELAP) for the analytical method used. Analyses for chemicals other than those having primary or secondary MCLs must be described in the approved Operations Plan. For analysis of chemicals not having primary or secondary MCL, M1W shall first consider using an approved drinking water method for the analyte(s) and if an approved drinking water method is not available for the analyte(s), M1W may consider using an approved wastewater method subject to review and approval by DDW which must be described in the approved Operations Plan.

I. Cross-connection Control Program

1. Any undesired or unintended reversal of flow of water or other liquids, gases, or other substances into the AWPF's product water lines, including product water delivery pipelines into the injection wells, are prohibited. Any such undesired or unintended reversal of flow must be reported to the Central Coast Water Board and DDW within 24 hours of the M1W's knowledge of the incident.

2. The AWPF must be inspected for possible cross-connections of potable water, wastewater, recycled water, chemicals, and other waste or non-potable piping systems prior to operation of the expanded AWPF and once every year thereafter. Piping systems must be inspected for possible cross-connections after making any modification to the AWPF plumbing system. The AWPF must have internal protection from cross-connections.

    a. The cross-connection inspections must be performed by an individual with a valid and current Cross-Connection Program Specialist certification issued by a certifying organization recognized by the State Water Board pursuant to the State Water Board Cross Connection Control Policy Handbook.

    b. The M1W must submit a written report documenting the result of the initial inspection with the program submitted to DDW. Subsequent inspection results must be included in the annual reports.

3. M1W must submit a comprehensive cross-connection control survey report for the expanded AWPF to DDW and the Central Coast Water Board prior to delivery of product water from the expanded AWPF to the injection wells. The

cross-connection control survey report must be submitted as a standalone document, separate from and prior to the submittal of the Operation Plan. Any deficiencies and recommendations identified in the survey report must be addressed and resolved prior to delivery of product water to the injection wells. Subsequent cross-connection control surveys must be conducted annually.

4. The AWPF must be designed to prevent any inadvertent or improper cross-connections between the potable water, industrial or process water, wastewater, recycled water, chemical, or other waste or non-potable systems. Potential points of vulnerability between the potable water, industrial or process water, wastewater, recycled water, chemical, and other on-site waste or non-potable piping systems must be identified in the Operations and Optimization Plan. The Operations and Optimization Plan must include procedures for routine inspection of these potential points of vulnerability, as well as reporting procedures if inadvertent or improperly designed cross-connections are discovered.

If you have any questions regarding this letter, please contact Susan Brownstein at (916) 322-7903 or via email at Susan.Brownstein@waterboards.ca.gov or Ginachi Amah at (818) 551-2046 or via email at Ginachi.Amah@waterboards.ca.gov.

Sincerely,

Ginachi Amah
Digitally signed by Ginachi Amah
Date: 2025.08.28 10:10:05 -07'00'

Water Boards

Dr. Ginachi Amah, P.E.
Recycled Water Unit Supervisor

cc (via e-mail):
Jeff Densmore, Jonathan Weininger, Nicholas Garibaldi (DDW – Field Operations)
Randy Barnard (DDW – Program Management)
Susan Brownstein (DDW – Recycled Water Unit)
Rachel Hohn, Leah Lemoine, Jennifer Epp, Harvey Packard (Central Coast Water Board)
Alison Imamura (Monterey One Water)